

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
LEE COUNTY, ILLINOIS**

ROBERT ALLEN,)	
)	
Plaintiff,)	2022LA00007
)	
v.)	Case No. 22 – L
)	
VERIZON,)	
)	
Defendants.)	

SUMMONS

TO EACH DEFENDANT: Verizon, 1684 S Galena Ave, Dixon, IL 61021

YOU ARE HEREBY SUMMONED and required to file an answer in this case or otherwise file your appearance, in the Office of the Circuit Clerk, LaSalle County Court House, 119 W. Madison St Rm 201, Ottawa, IL 61350 within 30 days after service of this summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.

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To the Officer: Lee County Sheriff, 240 E Progress Dr, Dixon, IL 61021

This summons must be returned by the officer or other person to whom it was given for service, with indorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so indorsed. This summons may not be served later than three (3) days before the date of appearance. This summons may not be served later than thirty (30) days after its date.

5/6/2022

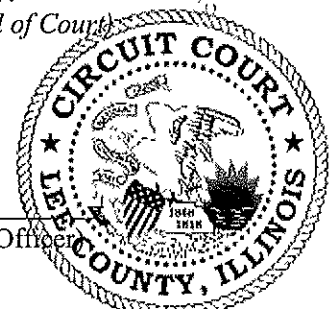
Witness _____

Amy Johnson AHB

Clerk of Court
(Seal of Court)

Attorney Travis Dunn; ARDC # 6319131
LAW OFFICES OF PETER F. FERRACUTI, P C
Attorney for: Plaintiff
110 East Main St, Ottawa, IL 61350
Phone: 815/434-3535; Fax: 815/434-4513

Date of _____
Service _____
(To be inserted by the Officer)



FACTS COMMON TO ALL COUNTS

4. Plaintiff was employed by the Defendant as a salesperson on May 8, 2020, and for approximately 5 years prior thereto.

5. In the course of his job duties, Plaintiff was criticized several times by employees and agents of the defendant MICHAEL BAKER and MONICA CHASE in connection with racially charged incidents between customers of the Defendant and the Plaintiff.

6. That in February of 2020, a Human Resources representative of Verizon corporate held a meeting with employees of the Dixon store of the Defendant.

7. That in the course of this meeting, the Human Resources representative invited questions in a group setting with employees of the store.

8. That when the Plaintiff requested information and clarification on how best to handle racially charged incidents with customers, the Human Resources representative refused to provide guidance,

9. That, at the aforementioned time and place, the Human Resources representative assured the Plaintiff that they would follow up with him to provide further information.

10. That the Plaintiff had reasonable belief that the above-described behavior of Defendant in handling the racial incidents violated the laws of the State of Illinois.

11. That on May 8, 2020 the Plaintiff was terminated from his employment with the Defendant.

12. That the Defendant claimed that the Plaintiff was being terminated due to having improperly utilized his employee account for discounts for family members.

13. That despite this claim, several other employees of the Defendant, including SHELLY YOLANDO and MICHAEL STEFFENS,

14. That the Defendant had instituted policies and guidance against harassment, bullying, and discrimination.

15. That the proximity between the Plaintiff's reports of harassment, intimidation, and fear for his safety and the termination of the Plaintiff indicates that the Plaintiff was discharged by the defendant from his employment as a direct result of his reports.

16. That the pretextual nature of the reasoning for terminating the Plaintiff lends support to the position that he was terminated in retaliation for his protected activities.

COUNT I:

WRONGFUL TERMINATION

17. Plaintiff restates and fully incorporates into Count I his allegations set forth in Paragraphs 1 through 16, above.

18. Plaintiff's good faith reports of customer behavior, as described above, were activities protected by virtue of their being reports of potentially criminal misconduct.

19. That both the criminal and civil code of the State of Illinois establish a clearly mandated public policy against racial harassment.

20. That there is no public policy more basic or more implicit in the concept of ordered liberty than the enforcement of a State's criminal code. See *Palmateer v. Int'l Harvester Co.*, 85 Ill. 2d 124, 132 (1981).

21. That the Plaintiff reported customer's behavior to the Defendant.

22. That such reports of potential criminal misconduct were protected by clearly mandated public policy. See *Nason v. Rockford Park Dist.*, 2014 IL App (2d) 130364-U, ¶ 21.

23. That the proximity in time between the reports of the Plaintiff and his unjustifiable termination raise the inference that the reports resulted in his termination.

24. Defendants' termination of Plaintiff's employment therefore was an illegal retaliatory discharge in violation of a clearly mandated public policy.

25. As a direct and proximate result of Defendants' illegal retaliatory termination of his employment as described above, Plaintiff has lost income in the form of wages, social security and other benefits, and has suffered emotional pain, mental anguish, loss of enjoyment of life, and other non-pecuniary losses, and he is expected to incur future damages.

WHEREFORE, Plaintiff, ROBERT ALLEN, respectfully prays that he may have judgment against the Defendant, VERIZON, in an amount in excess of the jurisdictional limits of this Court, and other such relief as this Court shall deem appropriate, and additionally, costs of this action.

COUNT II

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

26. Plaintiff realleges and incorporates paragraphs 1-25 as and for paragraph 26.

27. At all times relevant hereto, Defendant was aware of the harassing and threatening conduct of customers towards the Plaintiff.

28. Furthermore, Defendant was aware of the emotional distress the harassing conduct was causing the Plaintiff.

29. Nevertheless, Defendant failed and refused to provide any remedy to the Plaintiff, and instead continued to allow him to be subjected to the harassing conduct of customers.

30. Furthermore, Defendant terminated the Plaintiff, knowing full well that the incidents had already been causing him severe emotional distress.

31. Defendant acted with a reckless or conscious disregard of the certainty that its

actions and omissions would cause the Plaintiff severe emotional distress.

32. The actions of the Defendant, in failing to protect the Plaintiff with knowledge that the harassment was causing him severe emotional distress were therefore extreme and outrageous, and regarded as intolerable in a civilized society.

33. As a direct and proximate result of Defendant's acts and omissions, the Plaintiff did sustain such extreme emotional distress that no reasonable person should be expected to endure it.

34. Therefore, the Defendant is liable to the Plaintiff for intentional infliction of severe emotional distress.

WHEREFORE, Plaintiff, ROBERT ALLEN, respectfully prays that he may have judgment against the Defendant, VERIZON, in an amount in excess of the jurisdictional limits of this Court, and other such relief as this Court shall deem appropriate, and additionally, costs of this action.

Respectfully submitted,

Robert Allen, Plaintiff
BY: LAW OFFICES OF PETER F. FERRACUTI,
P.C.

By: /Travis Dunn
Travis Dunn, Attorney for Plaintiff

Travis Dunn
Attorney Number: 6319131
Law Offices of Peter F. Ferracuti
110 E. Main St., Ottawa, IL 61350
P (815) 434-3535
F (815) 434-2796
tdunn@peterferracuti.com



Lee County Circuit Court



Public : ◀ Case Status Summary · 2022LA00007 · Case Status Summary · 2022LA00007 · Case Status Summary

- CIVIL CASE ▾
- Case Status
- Civil Case
- Civil Hearings
- Judges
- Judgment/Orders
- Old Financial History
- ROA

CIVIL CASE STATUS SUMMARY ▶ 2022LA00007 Robert Allen vs. Verizon

CASE STATUS ▶ Pending - May 6, 2022

Page 1 of 1 (1 items)

DATE ▾	CASE STATUS
05/06/2022 12:00 AM	Pending
Page 1 of 1 (1 items)	

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Lee County Circuit Court


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CASE LOOKUP 2022 LA 00007 [RETRIEVE](#)**CIVIL CASE** ▾

Case Status

Civil Case

Civil Hearings

Judges

Judgment/Orders

Old Financial History

ROA

CIVIL CASE ▸ 2022LA00007 Robert Allen vs. Verizon**CASE STATUS** ▸ Pending - May 6, 2022**CASE INFORMATION**

JUDGE ▸	Lee, Douglas E	APPELLATE CASE NO. ▸	
PROSECUTOR ▸		LOCATION ▸	
CASE SUBTYPE ▸	Tort - Money Damages	FILING DATE ▸	05/06/2022
FILE LOCATION ▸	*****	APPEAL DATE ▸	
REMAND DATE ▸		APPEAL ACCEPTED DATE ▸	
DOM. VIOLENCE ▸	*	APPEAL UPHELD DATE ▸	
JURISDICTION ▸	Circuit	UNDER ADVISEMENT DATE ▸	*****
PHYSICAL FILE ▸	*	PREVIOUS CASE NO. ▸	*****
SEALED ▸	*	OTHER AGENCY CASE NO. ▸	
NEXT HEARING ▸	10/04/2022 01:30 PM-CH-L-F Progress Call	JURY REQUESTED ▸	<input type="checkbox"/>
BATCH LABEL ▸	<input type="checkbox"/>	JURY VERDICT ▸	<input type="checkbox"/>
COMPLEX CASE ▸	<input type="checkbox"/>	CLASS ACTION ▸	<input type="checkbox"/>
EXCEPTIONAL CASE ▸	<input type="checkbox"/>		
COMMENT ▸	*****		

LITIGANTS

1 - 2 of 2

SEL	LITIGANT	STATUS	ROLE ▲	ATTORNEY	CASE RELATIONSHIP
<input type="checkbox"/>	Allen, Robert		Plaintiff	Dunn, Travis	N
<input type="checkbox"/>	Verizon		Defendant		N

[REFRESH](#)[CANCEL](#)



Lee County Circuit Court

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SCHEDULING ▾

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CIVIL CASE ▾

Case Status

Civil Case

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CIVIL HEARING SUMMARY ▶ 2022LA00007 Robert Allen vs. VerizonCASE STATUS ▶ Pending - May 6, 2022

CONTINUANCE ONLY ▶ ☐

1 - 1 of 1

HEARING TYPE	JUDGE	COURT ROOM	START DATE ▲	PARTICIPANTS		OFFICERS		RESULT
CH-L-F Progress Call	Douglas E Lee	410	10/04/2022 - 01:30 PM					

REFRESH

CANCEL



Lee County Circuit Court



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CIVIL CASE ▾

Case Status

Civil Case

Civil Hearings

Judges

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CIVIL JUDGES ▶ 2022LA00007

CASE STATUS ▶ Pending - May 6, 2022

*JUDGE	*FROM	TO	SEND NOTICES	DEPARTMENT	REASON FOR REMOVAL
Lee, Douglas E	05/06/2022		*		*****

REFRESH CANCEL



Lee County Circuit Court

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CIVIL CASE ▾

Case Status

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ROA

CIVIL JUDGMENT/ORDER SUMMARY ▶ 2022LA00007 Robert Allen vs. Verizon CASE STATUS ▶ Pending - May 6, 2022

SEL	JUDGMENT/ORDER TYPE	FILING DATE	ORDER DATE	STATUS
<div>REFRESH CANCEL</div>				



Lee County Circuit Court

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Case Status

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Civil Hearings

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ROA

CIVIL OLD FINANCIAL HISTORY2022LA00007

CASE STATUSPending - May 6, 2022

BALANCES

CASE BALANCE0.00

BOND BALANCE0.00

TRUST BALANCE0.00

REFRESH

CANCEL

162.220.157.131/fullcourtweb/mvc/civilLegacyFinancialHistory/356020

1/1



Lee County Circuit Court



SEARCHES ▾

CASES ▾

SCHEDULING ▾

LOGOUT

Public : ◀ Case Status Summary · 2022LA00007 · Case Status Summary · 2022LA00007 · ROA Summary

CIVIL CASE ▾

Case Status

Civil Case

Civil Hearings

Judges

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ROA

CIVIL ROA SUMMARY ▸ 2022LA00007 Robert Allen vs. Verizon

CASE STATUS ▸ Pending - May 6, 2022

Advanced Search ▾

SORT DATE ▸ ☐ Ascending ☒ Descending

1 - 7 of 7

<input type="checkbox"/>	*DATE ▸ 05/06/2022 SEALED ▸ <input type="checkbox"/> *TEXT ▸ * Next Appearance: CH-L-F Progress Call , October 4, 2022 at 1:30 PM in Courtroom 410 with Judge Douglas E Lee.	*JUDGE ▸ Lee, Douglas E CODE ▸ CT HRST CV MICROFILM NUMBER ▸ ACTION TYPE ▸ ▾
<input type="checkbox"/>	*DATE ▸ 05/06/2022 SEALED ▸ <input type="checkbox"/> *TEXT ▸ Appearance filed by Attorney Travis Dunn, for Robert Allen.	*JUDGE ▸ Lee, Douglas E CODE ▸ CT ATTO MICROFILM NUMBER ▸ ACTION TYPE ▸ ▾
<input type="checkbox"/>	*DATE ▸ 05/06/2022 SEALED ▸ <input type="checkbox"/> *TEXT ▸ Complaint at Law: filed by Attorney Travis Dunn	*JUDGE ▸ Lee, Douglas E CODE ▸ ACTION MICROFILM NUMBER ▸ ACTION TYPE ▸ ▾
<input type="checkbox"/>	*DATE ▸ 05/06/2022 SEALED ▸ <input type="checkbox"/> *TEXT ▸ Issued Summons for service on Verizon, service by Attorney.	*JUDGE ▸ Lee, Douglas E CODE ▸ SM ALIA MICROFILM NUMBER ▸ ACTION TYPE ▸ ▾
<input type="checkbox"/>	*DATE ▸ 05/06/2022 SEALED ▸ <input type="checkbox"/> *TEXT ▸ Progress Call Notice filed - copy submitted to atty by email.	*JUDGE ▸ No Judge CODE ▸ PR CAL MICROFILM NUMBER ▸ ACTION TYPE ▸ ▾
<input type="checkbox"/>	*DATE ▸ 05/06/2022 SEALED ▸ <input type="checkbox"/> *TEXT ▸ Summons Issued: Fees paid by Allen, Robert Receipt Amount: \$306.00 Receipt #: 924559	*JUDGE ▸ Lee, Douglas E CODE ▸ ACTION SHERIFF MICROFILM NUMBER ▸ ACTION TYPE ▸ ▾
<input type="checkbox"/>	*DATE ▸ 05/06/2022 SEALED ▸ <input type="checkbox"/> *TEXT ▸ Tort - Money Damages (LA) filed by Allen, Robert. Receipt Amount: \$306.00 Receipt #: 924559	*JUDGE ▸ Lee, Douglas E CODE ▸ ACTION RECEIPT MICROFILM NUMBER ▸ ACTION TYPE ▸ ▾

1 - 7 of 7

LIST

REFRESH

CANCEL

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
LEE COUNTY, ILLINOIS**

ROBERT ALLEN,)	
)	2022LA00007
Plaintiff,)	
)	
v.)	Case No. 22 – L -
)	
VERIZON,)	
)	
Defendants.)	

COMPLAINT AT LAW

NOW COMES the Plaintiff, ROBERT ALLEN (“Plaintiff”), by and through his attorneys, THE LAW OFFICES OF PETER F. FERRACUTI, P.C., and for his Complaint against the Defendant, VERIZON (“Defendant”), states and alleges as follows:

PARTIES

1. Plaintiff is, and was at all times relevant hereto, a resident of the county of LaSalle, Illinois.
2. Defendant is a company conducting business at all times relevant to this complaint at a storefront, the address of which was 1684 South Galena Avenue in the city of Dixon, county of Lee, state of Illinois.

VENUE

3. Venue is proper within this Judicial Circuit because the primary actions and events that have given rise to the controversy occurred in Lee County, Illinois. 735 ILCS 5/2-101.

FACTS COMMON TO ALL COUNTS

4. Plaintiff was employed by the Defendant as a salesperson on May 8, 2020, and for approximately 5 years prior thereto.

5. In the course of his job duties, Plaintiff was criticized several times by employees and agents of the defendant MICHAEL BAKER and MONICA CHASE in connection with racially charged incidents between customers of the Defendant and the Plaintiff.

6. That in February of 2020, a Human Resources representative of Verizon corporate held a meeting with employees of the Dixon store of the Defendant.

7. That in the course of this meeting, the Human Resources representative invited questions in a group setting with employees of the store.

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13. That despite this claim, several other employees of the Defendant, including SHELLY YOLANDO and MICHAEL STEFFENS,

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16. That the pretextual nature of the reasoning for terminating the Plaintiff lends support to the position that he was terminated in retaliation for his protected activities.

COUNT I:

WRONGFUL TERMINATION

17. Plaintiff restates and fully incorporates into Count I his allegations set forth in Paragraphs 1 through 16, above.

18. Plaintiff's good faith reports of customer behavior, as described above, were activities protected by virtue of their being reports of potentially criminal misconduct.

19. That both the criminal and civil code of the State of Illinois establish a clearly mandated public policy against racial harrassment.

20. That there is no public policy more basic or more implicit in the concept of ordered liberty than the enforcement of a State's criminal code. See *Palmateer v. Int'l Harvester Co.*, 85 Ill. 2d 124, 132 (1981).

21. That the Plaintiff reported customer's behavior to the Defendant.

22. That such reports of potential criminal misconduct were protected by clearly mandated public policy. See *Nason v. Rockford Park Dist.*, 2014 IL App (2d) 130364-U, ¶ 21.

23. That the proximity in time between the reports of the Plaintiff and his unjustifiable termination raise the inference that the reports resulted in his termination.

24. Defendants' termination of Plaintiff's employment therefore was an illegal retaliatory discharge in violation of a clearly mandated public policy.

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WHEREFORE, Plaintiff, ROBERT ALLEN, respectfully prays that he may have judgment against the Defendant, VERIZON, in an amount in excess of the jurisdictional limits of this Court, and other such relief as this Court shall deem appropriate, and additionally, costs of this action.

COUNT II

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26. Plaintiff realleges and incorporates paragraphs 1-25 as and for paragraph 26.

27. At all times relevant hereto, Defendant was aware of the harassing and threatening conduct of customers towards the Plaintiff.

28. Furthermore, Defendant was aware of the emotional distress the harassing conduct was causing the Plaintiff.

29. Nevertheless, Defendant failed and refused to provide any remedy to the Plaintiff, and instead continued to allow him to be subjected to the harassing conduct of customers.

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32. The actions of the Defendant, in failing to protect the Plaintiff with knowledge that the harassment was causing him severe emotional distress were therefore extreme and outrageous, and regarded as intolerable in a civilized society.

33. As a direct and proximate result of Defendant's acts and omissions, the Plaintiff did sustain such extreme emotional distress that no reasonable person should be expected to endure it.

34. Therefore, the Defendant is liable to the Plaintiff for intentional infliction of severe emotional distress.

WHEREFORE, Plaintiff, ROBERT ALLEN, respectfully prays that he may have judgment against the Defendant, VERIZON, in an amount in excess of the jurisdictional limits of this Court, and other such relief as this Court shall deem appropriate, and additionally, costs of this action.

Respectfully submitted,

Robert Allen, Plaintiff
BY: LAW OFFICES OF PETER F. FERRACUTI,
P.C.

By: /Travis Dunn
Travis Dunn, Attorney for Plaintiff

Travis Dunn
Attorney Number: 6319131
Law Offices of Peter F. Ferracuti
110 E. Main St., Ottawa, IL 61350
P (815) 434-3535
F (815) 434-2796
tdunn@peterferracuti.com

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
LEE COUNTY, ILLINOIS**

ROBERT ALLEN,)	
)	
Plaintiff,)	2022LA00007
)	
v.)	Case No. 22 – L
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VERIZON,)	
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Defendants.)	

SUMMONS

TO EACH DEFENDANT: Verizon, 1684 S Galena Ave, Dixon, IL 61021

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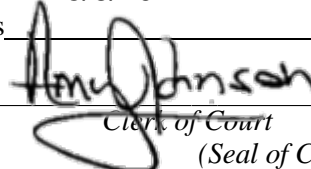
If you are unable to pay your court fees, you can apply for a fee waiver. For information about defending yourself in a court case (including filing an appearance or fee waiver), or to apply for free legal help, go to www.illinoislegalaid.org. You can also ask your local Circuit Clerk's office for a fee waiver application.

To the Officer: Lee County Sheriff, 240 E Progress Dr, Dixon, IL 61021

This summons must be returned by the officer or other person to whom it was given for service, with indorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so indorsed. This summons may not be served later than three (3) days before the date of appearance. This summons may not be served later than thirty (30) days after its date.

5/6/2022

Witness _____

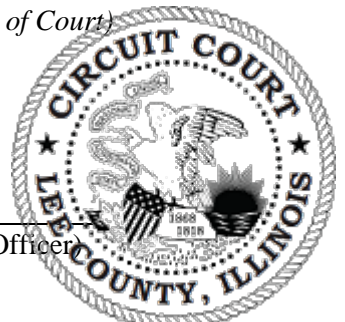


Clerk of Court
(Seal of Court)

AHB

Attorney Travis Dunn; ARDC # 6319131
LAW OFFICES OF PETER F. FERRACUTI, P.C.
Attorney for: Plaintiff
110 East Main St, Ottawa, IL 61350
Phone: 815/434-3535; Fax: 815/434-4513

Date of
Service _____
(To be inserted by the Officer)



SHERIFF'S FEES

Service and Return \$ _____
 Miles \$ _____
 TOTAL \$ _____

 Sheriff of _____ County

I certify that I served this summons on defendant as follows:

(a) (Individual defendants - personal):

By leaving a copy and a copy of the complaint with each individual defendant personally as follows:

Name of Defendant	Date of Service
_____	_____
_____	_____

(b) (Individual defendants - abode):

By leaving a copy and a copy of the complaint at the usual abode of each individual defendant with a person of his family, of age 13 years or upwards, informing that person of the contents of the summons, and also by sending a copy of the summons and of the complaint in a sealed envelope with postage fully prepaid, addressed to each individual defendant at his/her usual place of abode, as follows:

Name of Defendant	Person with Whom Left	Date of Service	Date of Mailing
_____	_____	_____	_____
_____	_____	_____	_____

(c) (Corporation or Defendants):

By leaving a copy and a copy of the complaint with the registered agent, officer or agent of each defendant corporation, as follows:

Defendant Corporation	Registered Agent Officer or Agent	Date of Service
_____	_____	_____
_____	_____	_____

(d) (Other Service):

Sheriff of _____ County
 By _____

**State of Illinois
In the Circuit Court of the 15th Judicial Circuit
Lee County**

Robert Allen vs. Verizon

Case Number: 2022LA00007

FILED
5 MAY 06 2022 5
Amy Johnson
LEE COUNTY CIRCUIT CLERK
BY _____

Progress Call Notice

This case is set for a progress call on the **4th** day of **October 2022**, at **1:30 PM** in courtroom **410**, located at **309 South Galena Avenue, Dixon, IL 61021**. All parties or their counsel are to be present before the Court at this call. Failure to appear may result in dismissal or default.

Lee County Circuit Clerk

Amy Johnson

Appearance

(12/30/15) CCL N530

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
LEE COUNTY, ILLINOIS**

FILED

Lee Co. Circuit Court
15th Judicial Circuit
Date: 6/22/2022 2:16 PM
Amy Johnson
AHB

ROBERT ALLEN,

Plaintiff,

v.

VERIZON,

Defendant.

Case No. 2022LA00007

APPEARANCE

× GENERAL APPEARANCE

0900 - APPEARANCE - FEE PAID; 0909 - APPEARANCE - NO FEE; -
0904 APPEARANCE FILED - FEE WAIVED

JURY DEMAND

1900 - APPEARANCE & JURY DEMAND - FEE PAID
1909 - APPEARANCE & JURY DEMAND - NO FEE

The undersigned enters the appearance of:

Plaintiff

× Defendants

VERIZON

(Insert litigant's name.)

s/ Sean C. Herring and James C. Goodfellow
Signature

☒ INITIAL COUNSEL OF RECORD
ADDITIONAL APPEARANCE

PRO SE
SUBSTITUTE APPEARANCE

A copy of this appearance shall be given to all parties who have appeared and have not been found by the Court to be in default.

× Atty. No.: 39408

(Please complete the following contact information.)

Name: JACKSON LEWIS P.C.

Atty. for: Verizon

Address: 150 N. MICHIGAN AVENUE, #2500

City/State/Zip: CHICAGO, IL 60601

Telephone: 312-787-4949

Primary Email: sean.herring@jacksonlewis.com

Secondary Email: james.goodfellow@jacksonlewis.com

Tertiary Email: _____

Additional Email: chicagodocketing@jacksonlewis.com;

kathleen.turner@jacksonlewis.com;

brittany.watkins@jacksonlewis.com;

Pro Se Only: I have read and agree to the terms of the Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on June 22, 2022, I caused a true and correct copy of the foregoing ***Appearance*** to be filed with the Court's Electronic Filing System, and that same will therefore be served upon all counsel of record.

/s/ Sean C. Herring